

PI - Referrals to Medicaid Fraud Control Unit (MFCU)

Purpose:

During the course of a review, there may be indications present that would need the involvement of the Medicaid Fraud Control Unit (MFCU). The procedure describes the steps followed when a referral to MFCU is suggested.

Identification of Roles:

IME PI—conduct a preliminary review and determine if case should be referred to MFCU and if so determined, give all documentation to MFCU.

MFCU— if MFCU cannot prosecute for criminal activity, they return the case to PI for administrative recovery.

Policy Unit—represent the state in discussions of cases.

Performance Standards:

Maintain sufficient detail in investigation documentation to support filing of sanctions, jury deliberations or other resulting actions that support the PI unit's position in the event of an appeal.

Path of Business Procedure:

Step 1. After a preliminary review or during a full review, it may be determined that a case should be referred to the Medicaid Fraud Control Unit (MFCU). Referrals to MFCU would be indicated in the following circumstances.

- a. A referral to the PI Unit with a referral reason that indicates suspected fraud or abuse.
- b. Provider is significantly non-compliant with DHS guidelines.
- c. Provider has continued aberrant practice after documented education regarding the issue.
- d. Preliminary review of the data either suggests or clearly substantiates fraud or abuse.

Step 2. The Investigator initiates the referral to MFCU process.

When fraud and/or abuse are suspected the Investigator will contact the Operations manager to discuss the findings. If necessary the PI Account Manager will be notified of the concerns.

- a. The Account Manager or Operations Manager notifies the MFCU Director either by phone or during the next regularly scheduled meeting. The Investigator will gather all documentation related to the referral. All documentation will be sent to the MFCU for its investigation.
- b. The Investigator will update the PI Database case status to “Hold for MFCU.”

Step 3. MFCU, PI and the Policy Unit will engage in regularly scheduled meetings to provide case status updates on any referrals made between the units. These meetings are referred to as “Policy Meetings.” Participants include PI Account Manager and Operations Manager, Investigator, State PI Staff, MFCU, attorneys from the AG’s office and other invited participants such as the OIG.

- a. The Account Manager may request a report from the PI Database for cases currently on “Hold for MFCU.”
- b. The Investigator is responsible for the agenda and minutes for the meeting. The agenda will include the list of all cases with upcoming appeals.
- c. Reviewers may be requested to attend the meeting with the Account Manager or Operations Manager when their cases are being discussed. After receiving case updates, Reviewers are responsible for updating the note section of the PI Database with any pertinent information.
- d. MFCU may return case referrals to PI during these meetings or through interoffice mail. MFCU will notify PI in writing of review findings. A copy of this will be sent to the Reviewer for scanning into OnBase.
 - Any records given to MFCU may be returned during these meetings or through interoffice mail.
 - If a case is returned the Reviewer will follow procedures for “Full Review Process.”

Step 4. The Reviewer is responsible for updating the PI Database with relevant information regarding cases referred to MFCU. This would include but not be limited to this list.

- a. Change current case status to “Hold for MFCU”
- b. Add case update information in the Notes tab after Policy meeting

- c. Document the specific PI records transferred/given to MFCU in the Notes tab
- d. Update current case status upon receipt back from MFCU

Forms/Reports:

<\\\\dhs\imeuniversal\Operational Procedures\Program Integrity\Forms and Letters\Approved Forms\Forms\MFCU Referral Checklist.doc>

RFP References:

6.5.2.5
6.5.3.2

Interfaces:

Program Integrity Unit
MFCU
State PI Staff
Attorney General's Office

Attachments:

None